



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SDD
F.#2012R01387

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 3, 2013

By Federal Express and ECF

Daniel Nobel, Esq.
305 Broadway
14th Floor
New York, NY 10007
(c/o Home Address)

Re: United States v. Ming Suan Zhang
Criminal Docket No. 12-666 (NGG)

Dear Mr. Nobel:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The enclosed materials are subject to the protective order entered in this case on December 6, 2012. The government also requests reciprocal discovery from the defendant.

Enclosed please find certified translations of recorded telephone calls with the defendant, which occurred on July 18, August 1, August 22, September 6 and September 13, 2012, bates-numbered 101-162.

In addition, enclosed please find email correspondence to and from the defendant, in original foreign language format, Bates-numbered 163 to 372. We are awaiting certified translations of these materials, and will provide them to you when they become available, along with audio copies of the calls described above, in original foreign language. In addition, enclosed please find a copy of an amended Search Warrant application, warrant and related order, Bates-numbered 373 to 427.

Also enclosed please find the hard drive you provided to the government, which contains copies of the electronic media that the government has extracted from the defendant's electronic

